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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

(Medford Division)

**JEFF BOARDMAN, DENNIS RANKIN,
ROBERT SEITZ, TODD L. WHALEY,
LLOYD D. WHALEY, SOUTH BAY
WILD, INC., MISS SARAH, LLC, and MY
FISHERIES, INC.,**

Plaintiffs,

v.

**PACIFIC SEAFOOD GROUP, OCEAN
GOLD HOLDING CO., INC., DULCICH,
INC., FRANK DULCICH, PACIFIC
SEAFOOD GROUP ACQUISITION
COMPANY, INC., PACIFIC SEAFOOD
WASHINGTON ACQUISITION CO.,
INC., BANDON PACIFIC, INC., BIO-
OREGON PROTEIN, INC., PACIFIC
CHOICE SEAFOOD COMPANY,
PACIFIC COAST SEAFOODS
COMPANY, PACIFIC GARIBALDI, INC.,
PACIFIC GOLD SEAFOOD COMPANY,
PACIFIC PRIDE SEA FOOD COMPANY,
PACIFIC SEA FOOD CO., PACIFIC
SURIMI CO., INC., PACIFIC TUNA
COMPANY, LLC, WASHINGTON CRAB**

Case No.: 1:15-cv-00108-MC

**PLAINTIFFS' RESPONSE TO PACIFIC
SEAFOOD'S MOTION TO COMPEL
ANSWERS TO INTERROGATORIES**

PRODUCERS, INC., PACIFIC ALASKA SHELLFISH, INC., SEA LEVEL SEAFOODS, LLC, ISLAND FISH CO., LLC, PACIFIC RESURRECTION BAY, PACIFIC CONQUEST, INC., CALAMARI, LLC, JO MARIE LLC, LESLIE LEE, LLC, MISS PACIFIC, LLC, PACIFIC FUTURE, LLC, PACIFIC GRUMPY J, LLC, PACIFIC HOOKER, LLC, PACIFIC HORIZON, LLC, PACIFIC KNIGHT, LLC, PRIVATEER LLC, SEA PRINCESS, LLC, TRIPLE STAR, LLC, PACIFIC FISHING, LLC, PACIFIC SEA FOOD OF ARIZONA, INC., STARFISH INVESTMENTS, INC., DULCICH SURIMI, LLC, BIO-OREGON PROPERTIES, LLC, PACIFIC GROUP TRANSPORT CO., PACIFIC MARKETING GROUP, INC., PACIFIC RUSSIA, INC., PACIFIC RUSSIA VENTURES, LLC, PACIFIC TUNA HOLDING COMPANY, INC., POWELL STREET MARKET LLC, PACIFIC FRESH SEA FOOD COMPANY, SEACLIFF SEAFOODS, INC., COPPER RIVER RESOURCE HOLDING CO., INC., PACIFIC COPPER RIVER ACQUISITION CO., INC., SEA LEVEL SEAFOODS ACQUISITION, INC., ISLAND COHO, LLC, S & S SEAFOOD CO., INC., PACIFIC SEAFOOD DISC, INC., DULCICH REALTY, LLC, DULCICH REALTY ACQUISITION, LLC, DULCICH JET, LLC, and OCEAN COMPANIES HOLDING CO., LLC,

Defendants.

On August 3, 2017, plaintiffs served Plaintiffs' Supplemental Response to Defendants' First Interrogatories, providing supplemental answers to interrogatory Nos. 1-4, 9-11, 15 and 17-19. Attached as Exhibit A is a copy of that pleading without the exhibits. Because plaintiffs'

original answers to Defendants' First Interrogatories as well as the attached supplemental answers are based in whole or in part on data or discovery documents designated as highly confidential under the terms of the Stipulated Protective Order in this case, the individual named plaintiffs are in no position to verify either the original set of interrogatory answers or the attached supplemental answers. Consistent with FRCP 33(b)(5), which requires that the person "who makes the answers must sign them," plaintiffs' counsel as the drafter of the answers based upon review of attorney's eyes only data or materials, has verified the answers at page 9 of Exhibit A. The above-described actions by plaintiffs moot defendants' motion to compel.

DATED this 3rd day of August, 2017.

HAGLUND KELLEY LLP

By: /s/ Michael E. Haglund
Michael E. Haglund, OSB No. 772030
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of August, 2017, I served the foregoing

PLAINTIFFS' RESPONSE TO PACIFIC SEAFOOD'S MOTION TO COMPEL

ANSWERS TO INTERROGATORIES, the following by the following indicated method(s):

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- ☐ by regular **mail** in a sealed first-class postage prepaid envelope and deposited with the United States Post Office at Portland, Oregon.
- ☒ by **email**.
- ☐ by **hand delivery**.
- ☐ by **overnight mail**.
- ☐ by **facsimile** as indicated.
- ☒ by transmitting full through the court's Cm/ECF system.

/s/ Michael E. Haglund

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Attorney for Plaintiffs